

STATE OF SOUTH CAROLINA

(Caption of Case)

Docket No. 2007-400-C/ Rulemaking Regarding
Prepaid Telecommunications Local
Services

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET
NUMBER: 2007 - 400

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2008 APR - 1 PM 1:44
SC PUBLIC SERVICE
COMMISSION

(Please type or print)

Submitted by: Steven W. Hamm, Esquire

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda
expeditiously

☒ Other: Letter filed in response to PSC 2/8/2008 request for comments to their Proposed Regulation.

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input checked="" type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunication	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Oder	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

Print Form

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March 31, 2008

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Reply to: Columbia
Email: shamm@richardsonplowden.com
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VIA HAND DELIVERY

The Honorable Charles L. A. Terreni
Chief Clerk and Administrator
The Public Service Commission of South Carolina
P. O. Drawer 11649
Columbia, S.C. 29211

RE: Docket No. 2007-400-C/ Rulemaking Regarding Prepaid Telecommunications Local
Services

Dear Mr. Terreni:

Verizon South Inc., (“Verizon”) respectfully files this letter in response to the Commission’s February 8, 2008 request for comments concerning proposed regulation 103-607, which would require prepaid local exchange telephone service providers to meet certain bonding or other security requirements.

The proposed regulation states that it “applies to telecommunications carriers who provide prepaid local exchange services (requiring advanced payment from customers prior to providing telecommunications service) and who *have not invested at least five million dollars in telecommunications facilities in the State of South Carolina.*” The stated purpose of the regulation “is to provide protection to consumers who do not receive services after they have paid money to receive prepaid telephone service.” By establishing a bonding or other security requirement, the proposed regulation seeks to ensure that customers are protected if the company faces financial distress and may not be able to reimburse its customers. The italicized language above exempts companies that have adequate capital to address the Commission’s concern without providing additional security.

Verizon agrees that this exemption is appropriate, but submits that the regulation should be clarified to apply only to carriers “who, individually or together with their affiliates,” have not invested at least \$5 million in telecommunications facilities in the state. That change would better implement the Commission’s intention of requiring bonding or other security only when necessary for the protection of the public.

If you should have any questions concerning this matter please contact my office.

Yours very truly,

RICHARDSON, PLOWDEN, &
ROBINSON, P.A.

A handwritten signature in black ink, appearing to read "Steven W. Hamm", with a long horizontal flourish extending to the right.

Steven W. Hamm

SWH/ceb